

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Jane Doe M.K., an individual,

Plaintiff,

v.

Salesforce.com, Inc., Backpage.com,
LLC, Carl Ferrer, Michael Lacey, John
Brunst, Scott Spear, Veer Hospitality
Phoenix LLC, SeaTac Hotels, LLC,
Evergreen Lodging Group, LLC, Madison
Avenue P&L Enterprises, Inc., G6
Hospitality, L.L.C., G6 Hospitality IP,
L.L.C., G6 Hospitality Property, L.L.C.,
G6 Hospitality Purchasing, L.L.C., G6
Hospitality Franchising, L.L.C. Motel 6,
Inc., Operating, L.P.; and DOES 1-200,
inclusive,

Defendants.

CASE NO. 2:24-cv-00435-TL

ORDER WITHDRAWING ORDER
ON REQUEST TO CONTACT
INDIVIDUALS UNDER
PROTECTIVE ORDER

It has come to the attention of the Court that Defendants did not fully comply with the terms of the Protective Order in this case (Dkt. No. 94). In particular, when Defendants submitted an *ex parte* letter to the Court of intent to contact Plaintiff's alleged traffickers and to

1 reveal Plaintiff's identity, Defendants failed to provide notice to Plaintiff of the submission
2 pursuant to Section IV.E. *See* Dkt. No. 94 at 9 ("Defendants shall submit an *ex parte* letter to the
3 court of its intent to contact Plaintiff's alleged trafficker(s) and to reveal Plaintiff's identity to the
4 alleged trafficker(s), *as well as provide Plaintiff with notice that it has done so.*" (emphasis
5 added)).

6 Accordingly, the Court WITHDRAWS its prior Order on Defendants' request to contact
7 individuals under the Protective Order. Dkt. No. 108 (sealed and *ex parte*). Defendants may
8 renew their request pursuant to the Protective Order after providing Plaintiff with appropriate
9 notice.

10 Further, the Court will amend the Protective Order to better articulate the procedures that
11 Defendants should follow in order to submit any *ex parte* requests for contact with Plaintiff's
12 alleged traffickers as follows:

- 13 1. Defendants shall be required to provide notice to Plaintiff of their intent to submit
14 an *ex parte* letter to the Court regarding their intent to contact Plaintiff's alleged
15 trafficker(s) and to reveal Plaintiff's identity to the alleged trafficker(s) *prior* to
16 submitting the letter to the Court, and shall be required to include a certificate of
17 notice regarding the same with its letter.
- 18 2. Defendants shall be required to file any such letters on the docket, sealed and *ex*
19 *parte*, in order to maintain the record before the Court.

20 Dated this 22nd day of August 2025.

21 

22 _____
Tana Lin
23 United States District Judge
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